

IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION

JONATHAN I. GEHRICH, ROBERT LUND,  
COREY GOLDSTEIN, PAUL STEMPEL and  
CARRIE COUSER, individually and on behalf  
of all others similarly situated,

Plaintiffs,

v.

CHASE BANK USA, N.A., and JPMORGAN  
CHASE BANK, N.A.,

Defendants.

NO. 1:12-CV-5510

Honorable Gary Feinerman

**DECLARATION OF BETH E. TERRELL IN SUPPORT OF JOINT MEMORANDUM  
REGARDING CLASS SETTLEMENT'S COMPLIANCE WITH RECENT SEVENTH  
CIRCUIT CLASS ACTION SETTLEMENT AUTHORITY**

I, Beth E. Terrell, declare as follows:

1. I am a member of the law firm of Terrell Marshall Daudt & Willie PLLC ("TMDW"), counsel of record for Plaintiff in this matter. I am admitted to practice before this Court pro hac vice and am a member in good standing of the bars of the States of Washington and California. I respectfully submit this declaration in support of the parties' Joint Memorandum Regarding Class Settlement's Compliance with Recent Seventh Circuit Class Action Settlement Authority. Except as otherwise noted, I have personal knowledge of the facts set forth in this declaration, and could testify competently to them if called upon to do so.

2. Neither I nor anyone at my firm has a personal relationship with, or is related in any manner to, any of the class representatives in this matter.

3. GCG submits regular reports to counsel regarding the notice program that this Court approved. As of today's date, GCG reports that the email notice has had a success rate of 94%. GCG also reports that of the 4,670,946 notices mailed 346,106 were returned undeliverable. GCG has since resent 242,341. Thus, to date, it appears that the mailed notice has a success rate of 98%. These statistics likely will change as the notice program progresses and more notices are returned and resent, but so far it appears the notice program has been very successful.

4. GCG also reports that 103,562 Settlement Class members have submitted claims.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

EXECUTED at Seattle, Washington, this 3rd day of December, 2014.

/s/ Beth E. Terrell, Admitted Pro Hac Vice  
Beth E. Terrell, Admitted Pro Hac Vice

CERTIFICATE OF SERVICE

I, Beth E. Terrell, hereby certify that on December 3, 2014, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system which will send notification of such filing to the following:

Kenneth Michael Kliebard  
Email: kkliebard@morganlewis.com  
Tedd Macrae Warden  
Email: twarden@morganlewis.com  
MORGAN LEWIS & BOCKIUS LLP  
77 West Wacker Drive  
Chicago, Illinois 60601-5094  
Telephone: (312) 324-1774  
Facsimile: (312) 324-1001

Julia B. Strickland  
Email: jstrickland@stroock.com  
Lisa M. Simonetti  
Email: lsimonetti@stroock.com  
Arjun P. Rao  
Email: arao@stroock.com  
Julieta Stepanyan  
Email: jstepanyan@stroock.com  
STROOCK & STROOCK & LAVAN LLP  
2029 Century Park East Suite 1600  
Los Angeles, California 90067-3086  
Telephone: (310) 556-5800  
Facsimile: (310) 556-5959

*Attorneys for Defendants*

DATED this 3rd day of December, 2014.

TERRELL MARSHALL DAUDT & WILLIE PLLC

By: /s/ Beth E. Terrell, Admitted Pro Hac Vice  
Beth E. Terrell, *Admitted Pro Hac Vice*  
Email: bterrell@tmdwlaw.com  
936 North 34th Street, Suite 300  
Seattle, Washington 98103-8869

*Attorneys for Plaintiffs*